

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF PENNSYLVANIA**

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|-----------------------------------|---|-----------------------------|
| In re: |) | |
| MICHELLE LEAH NOLAN, |) | Bankruptcy No. 20-21606-JAD |
| Debtor(s). |) | Chapter 7 |
| MICHELLE LEAH NOLAN, |) | |
| Movant(s), |) | |
| v. |) | Doc. No. 48 |
| TOYOTA MOTOR CREDIT, and |) | Related to Doc. Nos. 39, 44 |
| INTERLINK RECOVERY SERVICES, LLC, |) | |
| Respondents. |) | |

STIPULATED ORDER OF COURT

AND NOW, this 3rd day of September, 2020, after careful consideration of the Debtor's Motion for Sanctions for Willful Violation of 11 U.S.C. §362 and for Turnover of Property, it is **ORDERED and DECREED** that:

(1) The Respondent InterLink Recovery Services, LLC shall immediately deliver possession of the Debtor's vehicle, a 2020 Toyota Corolla, VIN# JTDEPRAE9LJ021685 (the "Vehicle") and its contents to the Debtor;

~~(2) The Respondent Toyota Motor Credit shall not make any further attempt to repossess the Vehicle while the Automatic Stay remains in effect;~~

~~_____ (3) The Respondent Toyota Motor Credit shall pay actual damages to the Debtor in the amount of \$_____ for lost wages and \$_____ for the fair rental value of the Vehicle;~~

~~_____ (4) The Respondent Toyota Motor Credit shall pay punitive damages to the Debtor for willful violation of 11 U.S.C. §362(a)(3) in the amount of \$_____;~~

~~_____ (5) The Respondent Toyota Motor Credit shall pay Attorney's fees to Debtor's Counsel, at the rate of \$195 an hour for his time and \$75 an hour for his paralegal's time, for a total amount of \$_____; and~~

(6) Other: The Parties shall forthwith file a Reaffirmation Agreement.



Jeffery A. Deller
United States Bankruptcy Judge

Stipulated and Agreed to:

/s/ Dai Rosenblum
Dai Rosenblum, Attorney for
Michele Leah Nolan, Debtor
254 New Castle Road, Suite B
Butler, PA 16001-2529
~~(724) 283-2900~~ PA ID No. 31802
dai@dairosenblumbankruptcy.com

/s/ Fred W. Freitag, IV, Esquire
By: Fred W. Freitag, IV, Esquire
Attorney ID No. 61770
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80 Business Park Drive, Suite 110
Armonk, New York 10504
(914)-219-5787
fwfreitagiv@gmail.com
Attorney for Respondent

Certificate of Notice Page 3 of 3
United States Bankruptcy Court
Western District of Pennsylvania

In re:
Michele Leah Nolan
Debtor

Case No. 20-21606-JAD
Chapter 7

CERTIFICATE OF NOTICE

District/off: 0315-2

User: lfin
Form ID: pdf900

Page 1 of 1
Total Noticed: 1

Date Rcvd: Sep 03, 2020

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Sep 05, 2020.

db +Michele Leah Nolan, 1400 Litman Grove Lane, Butler, PA 16001-7527

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
NONE. TOTAL: 0

***** BYPASSED RECIPIENTS *****

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Sep 05, 2020

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on September 3, 2020 at the address(es) listed below:

Dai Rosenblum on behalf of Debtor Michele Leah Nolan Jody@dairosenblumbankruptcy.com,
Dai@dairosenblumbankruptcy.com;Michael@dairosenblumbankruptcy.com
Fred W. Freitag, IV on behalf of Creditor TOYOTA MOTOR CREDIT CORPORATION
fwfreitagiv@gmail.com, LeopoldAssociatesPAX6428@projects.filevine.com
James Warmbrodt on behalf of Creditor NATIONSTAR MORTGAGE LLC bkgroup@kmlawgroup.com
James Warmbrodt on behalf of Creditor NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER
bkgroup@kmlawgroup.com
Office of the United States Trustee ustpregion03.pi.ecf@usdoj.gov
Preston D. Jaquish on behalf of Creditor First Commonwealth Bank pjaquish@lenderlaw.com
Rosemary C. Crawford crawfordmcdonald@aol.com, PA68@ecfbis.com

TOTAL: 7